

EXHIBIT 4

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING
JURY TRIAL DEMANDED
CASE NO.: 2:23-CV-00118-NDF

STEPHANIE WADSWORTH,
INDIVIDUALLY AND AS PARENT AND LEGAL
GUARDIAN OF W.W., K.W., G.W., AND L.W.,
MINOR CHILDREN, AND MATTHEW
WADSWORTH,
Plaintiffs

V.

WALMART, INC. AND JETSON
ELECTRIC BIKES, LLC,
Defendants

DEPONENT: LAYNE WADSWORTH
DATE: MAY 20, 2024
REPORTER: MELODIE BERGERON

1 A. Yes.

2 Q. And did Gunner then get back into bed?

3 A. The -- the noise -- the -- the noise -- I woke
4 up when he was getting back in bed.

5 Q. Okay. So the noise was you heard him coming
6 back into the bedroom?

7 A. Yeah.

8 Q. All right. And was that when he opened the
9 door to come back into the bedroom that you heard the
10 noise?

11 A. No. He tried closing it, but it didn't close,
12 and it went back to the wall.

13 Q. Okay. So Gunner tried to close the door?

14 A. Yes.

15 Q. And then the door stayed open?

16 A. Yes.

17 Q. And did you get out of bed at all at that
18 time?

19 A. No.

20 Q. And were you able to fall back asleep?

21 A. Yes.

22 Q. And was the next time that you woke up -- was
23 that when the fire started?

24 A. Yes.

25 Q. Okay. What did you see when the fire started?

1 Or let me ask you this: What woke you up?

2 A. The window breaking.

3 Q. Okay. And that was your bedroom window?

4 A. Yes.

5 Q. And did any glass get into your bed?

6 A. No.

7 Q. And you were on the bottom bunk; is that
8 right?

9 A. Yes.

10 Q. Okay. So Gunner would've had the top bunk --

11 A. Yeah.

12 Q. -- above you? So did you just hear the window
13 break?

14 A. Yes.

15 Q. And was that the first thing that woke you up

16 --

17 A. Yes.

18 Q. -- during the fire?

19 MR. WADSWORTH: Sorry.

20 MR. LAFLAMME: That's fine. Do you need water?

21 MR. WADSWORTH: I've got a drink.

22 MR. LAFLAMME: Okay.

23 BY MR. LAFLAMME:

24 Q. All right. And then once you woke up when the
25 fire started, what did you do?